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Hearing Date: November 30, 2011
Objection Deadline: November 16, 2011
at 5:00 p.m.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>SECURITIES INVESTOR PROTECTIONS CORPORATION</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>BERNARD L. MADOFF INVESTMENT SECURITIES LLC,</p> <p style="text-align: right;">Defendant.</p> <hr/> <p>In re:</p> <p>BERNARD L. MADOFF,</p> <p style="text-align: right;">Debtor.</p>	<p>Adv. Pro. No. 08-01789(BRL)</p> <p>SIPA Liquidation</p> <p>(Substantively Consolidated)</p>
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**RESPONSE TO TRUSTEE'S MOTION FOR ENTRY OF AN ORDER
ESTABLISHING NOTICE PROCEDURES AND OBJECTION IN PART**

Undersigned attorneys Richard A. Cirillo and Joshua T. Edgemon are counsel for claimants National Bank of Kuwait S.A.K. NBK Banque Privée, Lemanica SICAV-SIF, Kookmin Bank, and Korea Exchange Bank, and undersigned attorneys Arthur J. Steinberg and Heath D. Rosenblat are counsel for the Pascucci Family, in connection with various proceedings involving Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff; their filings have specified the limitations and nature of their participation in the BLMIS and Madoff-related proceedings.

The undersigned have no objection to the principle of the Trustee's program to provide notice by e-mail and otherwise in order to reduce costs, complications, and time. However, the Order should make explicit that the proposed program of simplified notice does not apply to the Trustee's obligations to service jurisdictional documents, such as summonses and complaints, and orders to show cause, with the formalities and in the manner specified by applicable treaties, conventions, statutes, and rules for providing proper jurisdictional notice. This may, or may not, be implicit in the Trustee's motion and proposed Order, but it should be made explicit. If and to the extent the intent or interpretation of the Order would deviate from proper jurisdictional notice processes, this response constitutes an objection on the ground that Bankruptcy Rules and Orders cannot override the requirements of treaties, conventions, statutes, or the Constitution.

Dated: New York, NY
October 31, 2011

Respectfully submitted,
KING & SPALDING LLP

by



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--and--

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